

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STEVEN G. MILLETT, MELODY J. MILLETT,
On Behalf of Themselves and All Others
Similarly Situated,

Plaintiffs,

v.

TRUELINK, INC.,
A Trans Union Company,

Defendant.

Case No. 05-599-SLR

UNOPPOSED MOTION TO EXTEND DISCOVERY DEADLINE

Plaintiffs Steven and Melody Millett, by and through counsel of record, file this motion for an Order from the Court allowing Plaintiffs to take the deposition of Scott Metzger, an officer of Defendant TrueLink, Inc., after the date of the discovery deadline set forth on the Court's Scheduling Order. (Doc. 82) In support thereof, Plaintiffs state as follows:

1. Plaintiffs were unable to schedule the deposition of Mr. Metzger prior to September 15, 2007, the date that the Court directed for the close of discovery in this matter.
2. In order to accommodate the schedules of the deponent and counsel, it will be necessary to reschedule the deposition of Mr. Metzger on either July 25, 2007, or on August 3, 2007. Plaintiffs' counsel is coordinating schedules and will amend the notice of deposition (Doc. 117) as soon as possible to select one of these dates offered by defense counsel.

3. Counsel for Defendant has indicated to Ms. Yeager that it does not oppose the motion to take the deposition outside the time set by the Court for the close of discovery.
4. This motion is not being filed for the purposes of harassment or delay. The parties have cooperated in discovery and have cooperated to coordinate the depositions taken in this matter.
5. Additional deadlines set forth in the Court's Scheduling Order should not be affected by the extension of time to allow this deposition.

Wherefore, Plaintiffs request an Order from the Court allowing Plaintiff to take the deposition of Mr. Scott Metzger, at a time and place mutually convenient to both counsel and the deponent, on a date outside the time period proscribed by this Court for the end of discovery.

DATED: July 16, 2007

Respectfully submitted,

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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, Christopher J. Curtin, Esq., hereby certify that on July 16, 2007, I electronically filed the foregoing Unopposed Motion to Extend Discovery Deadline with Clerk of the United States District Court using the CM/ECF system, which will send electronic notice to the following: to:

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and that I served a copy electronically this day to the following:

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